

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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ROBERT PERRY,

Plaintiff,

Case No. 20-CV-5656  
(JMA)(JMW)

- against -

HALF HOLLOW HILLS CENTRAL SCHOOL DISTRICT,  
DR. JEFFREY WOODBERRY, MR. WAYNE EBANKS,  
and JEFFREY PALUMBO,

Defendants.

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JOSHUA S. SHTEIERMAN, an attorney duly authorized to practice law before the courts of the State of New York, and specifically before the United States District Court of the Eastern District of New York, affirms the following under penalty of perjury:

1. I am with the firm of the VOLZ & VIGLIOTTA, PLLC and I represent the defendants HALF HOLLOW HILLS CENTRAL SCHOOL DISTRICT, DR. JEFFREY WOODBERRY, MR. WAYNE EBANKS, and JENNIFER PALUMBO (hereinafter "Defendants") in the above-captioned matter. I submit this declaration in support of defendants' motion to dismiss the plaintiff's Complaint in its entirety.

2. Plaintiff initiated this action by filing a Complaint with the Court on November 19, 2020.

3. On or about March 11, 2021, the plaintiff, without seeking leave of the Court, filed an Amended Complaint.

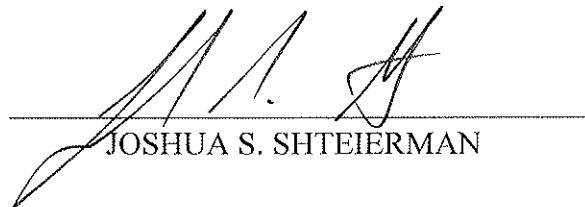
4. The accompanying Memorandum of Law addresses defendants' legal arguments in detail.

5. Annexed hereto as exhibits are the following documents:

- A. Amended Complaint, dated November 17, 2020;
- B. Woodberry letter, dated February 8, 2018;
- C. NYSDHR Determination, dated April 4, 2019;
- D. EEOC Right to Sue Letter, dated June 25, 2019;
- E. Section 75 Charges, dated November 21, 2018;
- F. Stipulation of Settlement and Release, dated March 1, 2019;
- G. NYSDHR Complaint, dated November 13, 2019; and
- H. NYSDHR Determination, dated May 20, 2020.

WHEREFORE, it is respectfully requested that this Court grant defendants' motion to dismiss plaintiff's Complaint in its entirety.

Dated: Nesconset, New York  
July 27, 2021



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JOSHUA S. SHTEIERMAN